

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
STEPHEN D. GILL and MICHELLE GILL,)	
)	
Plaintiffs,)	CIVIL ACTION
)	NO. 05-10309-MLW
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
_____)	

**DEFENDANT'S MOTION
TO EXTEND TIME TO ANSWER
OR OTHERWISE RESPOND TO COMPLAINT**

The government moves for an extension of time of three (3) business days, to and including May 23, 2005, within which to respond to the Complaint in the above-captioned case. As grounds for this motion, the undersigned counsel states that she only recently received all relevant materials from the Department of the Navy and the Department of Labor which were necessary in formulating a proper response to the Complaint. In addition, the undersigned had an unexpected matter arise in another case, which required an immediate response. Last, the government, in conferencing with plaintiffs' counsel, was directed to certain cases that plaintiffs' counsel suggested are relevant to the government's anticipated response to the Complaint and which the government would like additional time to review.

Wherefore, the government respectfully requests that the Court allow this motion for an extension of time in which to answer or otherwise respond to the Complaint.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

/s/Eugenia M. Carris
Eugenia M. Carris
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(617) 748-3100

Dated: May 17, 2005

L.R. 7.1 Certification

The undersigned counsel states that she contacted plaintiffs' counsel and that he does not assent to the relief sought by this motion.

/s/Eugenia M. Carris
Eugenia M. Carris

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was served by first-class mail on May 17, 2005, upon plaintiffs' counsel, Timothy Morgan, Esq., 33 College Hill Road, Suite 16G, Warwick, RI 02886. The foregoing was also mailed on this date to pro se plaintiff Stephen D. Gill, Esq., Young, Bill, Fugett & Roubos, P.A., P.O. Drawer 1070, Pensacola, FL 32591-1070.

/s/Eugenia M. Carris
Eugenia M. Carris